

APR 27 1999  
FCC MAIL ROOM

APR 27 1999

FOUO MAIL ROOM

Before the

Washington, D.C. 20554

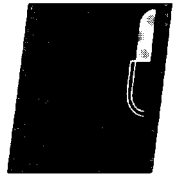
## Creation of a Low Power Radio Service

RM-9208  
RM-9242

**Robert Jung-VP/General Manager "Midwest Communications"**  
**WDEZ-WIFC-WIZD-WOFM-WRIG-WSAU**

No. of Copies rec'd 0+4  
List A B C D E

March 30, 1999



The Honorable William Kennard  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Mr. Chairman:

This letter is regarding the Notice of Proposed Rulemaking that the FCC has begun on the issue of low-power FM, also known as microradio. While I applaud the Commission's intentions, I have deep concerns about the effects of such a proposal.

One of the major tasks that the FCC is charged with is to ensure that our broadcast and other services are maintained in as interference-free an environment as possible. However, when I look at the low-power FM proposal, it is clear to me that the Commission is giving serious consideration to abandoning its interest in protecting against interference by looking to add these new stations. We must maintain the integrity of the spectrum. Elimination and/or alteration to the current standards will result in increased interference to existing broadcaster's signals, and a loss of service to listeners.

A related concern is what effect low-power FM service will have on the development of In-Band, On-Channel "IBOC" digital radio. The proponents of IBOC digital radio have been developing their systems based on the current interference protection standards. It is my understanding, that digital radio promises greatly improved clarity and service to the public. It doesn't seem to me to be in the public interest to consider low-power FM, if the service has the potential to seriously impair the ability of the digital signals to reach listeners unimpeded by interference.

I urge you and your fellow commissioners to give serious consideration to placing any low-power FM action on hold until these technical concerns are resolved. I believe that this rulemaking is far in advance of the research needed to demonstrate that it is both technically feasible as well as good public policy.

**WSAU**  
NEWS RADIO 550

**94.7** *Oldies* **99.9**  
**WOFM** **WIZD**

*Great Country!*  
**WDEZ** 101.9

**95.5**  
**WIFG**

**WRIG**  
BIG WRIG 1390

Phone: 715-355-1614 • Fax: 715-359-0520  
Address: PO Box 2048 • Wausau, WI 54402-2048

Page 2

Here in Central Wisconsin, our listeners depend on our local radio stations for news, weather, public affairs and other programming. With all the unanswered questions, it is hard to see how low-power FM is in their public interest.

Thank you for your consideration of these views.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Jung', with a large, stylized flourish extending to the right.

Robert Jung  
VP/General Manager  
Midwest Communications